

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
ROANOKE DIVISION

WINFORD DALLAS JONES,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
C.H. ROBINSON WORLDWIDE, INC.,	)	
	)	
Defendant/Third Party Plaintiff.	)	
	)	
v.	)	
	)	Civil Action No. 7:06-CV-00547
AKJ ENTERPRISES, INC., d/b/a	)	
Unlimited Express	)	
	)	
And	)	
	)	
ELSON BOLAR,	)	
	)	
And	)	
	)	
DONNIE BOLAR,	)	
	)	
Third Party Defendants.	)	

**OBJECTIONS TO PLAINTIFF'S PROPOSED JURY INSTRUCTIONS**

C.H. Robinson Worldwide, Inc. ("C.H. Robinson"), by counsel, objects to plaintiff's proposed jury instructions served on April 25, 2008 and states as follows:

1. For ease of reference, C.H. Robinson has hand-designated plaintiff's jury instructions A-A5 and attached its designation hereto as Exhibit 1.
2. C.H. Robinson objects to instruction D, F, M, N, O, P, Q, R, S, T, U, V, W, X, Y, Z, A1, A2, A3, A4, A5 on the grounds that these instructions are either an

incorrect statement of Virginia law, do not conform to the case as currently postured and/or is repetitive and/or confusing.

3. C. H. Robinson reserves the right to amend its objections to the aforementioned instructions at any time prior to trial and further reserves the right to amend its own instructions to conform to the recent rulings of the Court at the hearing on or about April 28, 2008.

C.H. ROBINSON WORLDWIDE, INC.,  
et al.

/s://Paul C. Kuhnel, Esq.

Paul C. Kuhnel (VSB #28151)  
Robert Michael Doherty (VSB #43997)  
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**Counsel for C.H. Robinson Worldwide, et al.**

**CERTIFICATE**

I hereby certify that I electronically filed the foregoing with John F. Corcoran, Clerk, U. S. District Court, using the CM/ECF system which will send notification of such filing to the following on this **29<sup>th</sup>** day of **April, 2008** to:

Gary C. Hancock, Esq.  
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**Co-Counsel for the Plaintiff**

**/s:// Paul C. Kuhnel, Esq.**

s:\robinson\_ch\19765\obj to pl's proposed jury instructions.doc4/29/08bc